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*Attorney for the Plaintiff*

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FABIAN ROJAS,

*Plaintiff,*

-vs-

COUNTY OF PASSAIC, PASSAIC  
COUNTY SHERIFF'S DEPARTMENT,  
AND JERRY SPEZIALE

*Defendants.*

UNITED STATES DISTRICT COURT  
: DISTRICT OF NEW JERSEY  
: NEWARK VICINAGE

DOCKET NO. 04-CV-3048 (SDW):

CIVIL ACTION

VERDICT SHEETS

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**I. EMPLOYMENT DISCRIMINATION**

A. Do you find that Plaintiff proved by a preponderance of the evidence that he was a member of a protected class and terminated from a position for which he was qualified?

YES \_\_\_\_\_ NO \_\_\_\_\_

If the answer to the above question is YES, go onto to the next question?

If your answer to the above question is NO, stop at this point and return a verdict for the Defendant.

B. Do you find that the Defendant(s) have articulated or advanced a legitimate business reason for its decision to terminate the Plaintiff?

County of Passaic: YES \_\_\_\_\_ NO \_\_\_\_\_

Passaic County Sheriff's Department

YES \_\_\_\_\_ NO \_\_\_\_\_

Jerry Spezzale YES \_\_\_\_\_ NO \_\_\_\_\_

If the answer to the above question is YES, go onto to the next question?

If your answer to the above question is NO, stop at this point and return a verdict for the Defendant.

C. Do you find by a preponderance of the evidence, that Plaintiff has proven that Defendant(s)' legitimate business reason was a pretext for discrimination?

County of Passaic: YES \_\_\_\_\_ NO \_\_\_\_\_

Passaic County Sheriff's Department

YES \_\_\_\_\_ NO \_\_\_\_\_

Jerry Spezzale YES \_\_\_\_\_ NO \_\_\_\_\_

## II. DAMAGES

I. What sum of money will fairly and reasonably compensate the Plaintiff, Fabian Rojas, for damage he sustained as a result of the Defendant(s)' actions?

A. Pain, Suffering, Disability, Impairment, Inconvenience, Loss of Enjoyment of Life? \$ \_\_\_\_\_

B. Past Medical Expenses? \$ \_\_\_\_\_

C. Future Medical Expenses? \$ \_\_\_\_\_

D. Past Lost Wages? \$ \_\_\_\_\_

E. Future Lost Wages? \$ \_\_\_\_\_

2. Do you find by a preponderance of the evidence that Defendant(s)' actions resulting in harm to the Plaintiff was done with malice or reckless indifference for his federally protected rights warranting the necessity of punitive damages?

YES \_\_\_\_\_ NO \_\_\_\_\_

3. If so, what amount of damages should be imposed on each of the following defendants?

County of Passaic: \_\_\_\_\_

Passaic County Sheriff's Department: \_\_\_\_\_

Jerry Speziale: \_\_\_\_\_